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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT UBER'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
MOTION TO COMPEL 30(B)(6) TOPICS  
AND EXHIBITS THERETO**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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I, Felipe Corredor, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Defendant Uber's Administrative Motion to File Under Seal Portions of its Motion to Compel 30(b)(6) Topics (the "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Motion to Compel 30(b)(6) Topics ("Motion")	Highlighted Portions	Waymo
Declaration of Esther Chang	Highlighted Portions	Waymo
Exhibits 1, 6 & 8	Highlighted Portions	Waymo
Exhibits 2-5 & 9-12	Entireties	Waymo

3. The green and/or red highlighted portions of the Motion, the Declaration of Esther Chang, and Exhibits 6 & 8, as well as the entireties of Exhibits 9-12 contain, discuss, or refer to Waymo's confidential business information, including internal Waymo documents describing its market analyses, plans, forecasts, and financial information, as well as confidential valuations of Waymo. I understand that this confidential business information is maintained by Waymo as secret and public disclosure would give Waymo's competitors access to sensitive information that could be used to harm Waymo's competitive standing. Additionally, the green and/or red portion highlighted portions of the Motion and Exhibit 1, as well as the entireties of Exhibits 2-5 contain, discuss, or refer to confidential details regarding the corporate ownership, corporate leadership, business models, prototype development and testing, and employee recruitment efforts, which Waymo understands are highly confidential to Kitty Hawk, and disclosure of such information would inflict serious and irreparable damage to Kitty Hawk's business. (See Dkt No. 1115 ¶ 3). Waymo's request to seal is narrowly tailored to only the confidential information contained in the above-listed documents.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct, and that this declaration was executed in San Francisco, California, on August 24,  
3 2017.

4 By /s/ Felipe Corredor  
5 Felipe Corredor  
6 Attorneys for WAYMO LLC

7 **SIGNATURE ATTESTATION**

8 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
9 filing of this document has been obtained from Felipe Corredor.

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11 /s/ Charles K. Verhoeven  
12 Charles K. Verhoeven

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